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9

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
12

13 ADRIAN ROMERO,

14 Plaintiff,

15 v.

16 COUNTY OF LOS ANGELES;  
SERGIO CAMPOS; DAMIEN  
17 GUERRERO; JUSTIN PEREZ; and  
DOES 1-10, inclusive,

18 Defendants.  
19

Case No. 2:23-cv-02025-GW(PVCx)

**JOINT STATUS REPORT RE  
STATUS OF SETTLEMENT**

[Assigned to Hon. George H. Wu  
Courtroom 9D]

21 **TO THIS HONORABLE COURT:**

22 Defendants, COUNTY OF LOS ANGELES, SERGIO CAMPOS, DAMIEN  
23 GUERRERO and JUSTIN PEREZ and Plaintiff, ADRIAN ROMERO, ("Parties")  
24 jointly, submit this status report in advance of the scheduled Status Conference on  
25 January 16, 2025.

26 **RECITALS**

27 1. On January 12, 2024, the parties participated in a mediation with  
28 ADR Panel Mediator Richard Copeland and all parties reached a settlement

1 agreement to resolve the matter in its entirety. The Parties signed a stipulation for  
2 settlement on that date.

3       2.       The settlement is conditioned upon the approval by the relevant Los  
4 Angeles County boards, including the Los Angeles County Claims Board and the  
5 Board of Supervisors, which defense counsel will be recommending. As  
6 previously advised, the process of obtaining approvals from the Los Angeles  
7 County Claims Board and Board of Supervisors is expected to take 9-12 months  
8 from the date the settlement agreement is fully executed by the parties.

9       3.       Plaintiff received the draft of the settlement agreement from Defense  
10 Counsel on March 21, 2024. The County received the executed settlement  
11 agreement from Plaintiff on June 12, 2024.

12       4.       The Los Angeles County Board of Supervisors has established  
13 protocols in lawsuits. Where the liability of the settlement or judgment exceeds  
14 \$100,000, a Corrective Action Plan (CAP) (a confidential document) and a  
15 Summary Corrective Action Plan (SCAP) (a public record) must be produced.

16       5.       After the subject settlement agreement was fully executed, the  
17 settlement moved on to the CAP phase. The CAP process involves several steps  
18 in its preparation, including investigation, drafting, and revisions, followed by  
19 approval of multiple levels of LASD personnel. The County is in the CAP process  
20 phase of the approvals process. Most recently, the draft CAP was reviewed by  
21 the CEO and returned to the Los Angeles Sheriff's Department for revisions.

22       6.       Once the final review and signatures are completed in the CAP  
23 process, the matter will be placed on the agenda for approval by the Claims  
24 Board.

25       7.       After approval by the Claims Board, the matter will typically go  
26 before the Board of Supervisors within approximately 60 days. After the County  
27 Board of Supervisors' approval, the settlement documents and Plaintiff's payment

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1 instructions will be submitted to the Los Angeles County Auditor-Controller, and  
2 then the settlement payment will be issued.

3        8.           The Parties request the Court allow additional time for the settlement  
4 approval process to proceed.

5       9.       Accordingly, the parties request that the Court set a status  
6 conference in approximately four (4) months so that the parties may update the  
7 Court regarding the status of the approval of the settlement.

9 | DATED: January 14, 2025 HURRELL CANTRALL LLP<sup>1</sup>

By: /s/ Katherine E. Orletsky

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PEREZ

19 | PAGED: January 14, 2025

LAW OFFICES OF DALE K. GALIPO

By: /s/ Shannon J. Leap  
Dale K. Galipo  
Shannon J. Leap  
Attorneys for Plaintiff

<sup>26</sup> <sup>27</sup> <sup>28</sup> <sup>1</sup> Defendants' undersigned counsel attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the document's content and have authorized the filing.